

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
MEMPHIS DIVISION**

In re:

BANKRUPTCY  
CASE NO. 15-28912

Kathleen Diane Young  
Debtor

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Rushmore Loan Management  
Services, LLC  
Respondent

CHAPTER 13

Kathleen Diane Young  
Sylvia F. Brown, Trustee  
Respondents

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**OBJECTION TO CONFIRMATION**

COMES NOW, Rushmore Loan Management Services, LLC, and makes and files its Objection to the Confirmation of the Debtor's Chapter 13 plan for the reasons set forth below:

1.

Rushmore Loan Management Services, LLC holds a first priority deed of trust on the Debtor's residence at 2670 Kate Bond Road, Memphis, Tennessee 38133.

2.

The Debtor's plan states arrearage owed to Rushmore Loan Management Services, LLC at \$70,000.00.

3.

Rushmore Loan Management Services, LLC's arrearage through date of filing is \$83,137.79.

4.

The Debtor's plan is inaccurate and does not provide Rushmore Loan Management Services, LLC with adequate protection.

THEREFORE, based upon the above and foregoing facts, Rushmore Loan Management Services, LLC objects to the Confirmation of the Debtor's Chapter 13 Plan.

This the 5th day of October, 2015

Respectfully Submitted

**/s/Richard B. Maner**

Richard B. Maner, TBN 024019

Attorney for Rushmore Loan Management  
Services, LLC

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**CERTIFICATE OF SERVICE**

This is to certify that I have served a copy of **OBJECTION TO CONFIRMATION** electronically. Those not served electronically have been served by depositing same in the United States Mail in a properly addressed envelope to each with adequate postage thereon as follows:

Kathleen Diane Young  
2670 Kate Bond Road  
Memphis, TN 38133

Brian Lynn  
67 Madison Avenue  
Suite 714  
Memphis, TN 38103

Sylvia F. Brown  
200 Jefferson Avenue., Suite 1113  
Memphis, TN 38103

This the 5th day of October, 2015

Respectfully Submitted

**/s/Richard B. Maner**

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